

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
Docket No. 2011-432-C

In the Matter of the Application of)
Roman LD, Inc. for a)
Certificate of Public Convenience and Necessity)
to Provide Resold Interexchange)
Telecommunications Services Throughout)
The State of South Carolina and for)
Alternative Regulation)
_____)

SUPPLEMENTAL TESTIMONY
OF MARIA ELENA ZEPEDA
ON BEHALF OF
ROMAN LD, INC.

PUBLIC VERSION

Roman LD, Inc.
2300 Valley View Lane, Suite 340
Irving, Texas 75062
Telephone: 972.793.8636
Facsimile: 972.408.4150

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Maria Elena Zepeda and my business address is 2300 Valley View Lane,
3 Suite 340, Irving, Texas 75062

4 Q. BY WHOM ARE YOU EMPLOYED?

5 A. I am employed by Roman LD, Inc. ("Roman"), an applicant for interexchange Certificate
6 of Public Convenience and Necessity in South Carolina.

7 Q. WHAT IS YOUR POSITION WITH ROMAN?

8 A. I serve as President of the Company.

9 Q. WHAT ARE YOUR JOB RESPONSIBILITIES?

10 As Roman President, I am responsible for the entirety of the Company's operations,
11 profitability, strategic planning and implementation of strategic initiatives.

12 Q. COULD YOU PLEASE TELL US ABOUT YOUR BACKGROUND?

13 A. My resume is attached as Exhibit A to this Testimony.

14 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

15 A. The purpose of my testimony is to present evidence in support of Roman's *Application*
16 *for Certificate of Public Convenience and Necessity to Provide Resold Interexchange*
17 *Telecommunications Services Throughout The State of South Carolina* by demonstrating
18 that Roman has the ability to provide reliable competitive interexchange
19 telecommunications services throughout the State of South Carolina, and by
20 demonstrating why the granting of a Certificate of Public Convenience and Necessity to
21 Roman is in the public interest.

22 Q. WHY HAVE YOU SUPPLEMENTED YOUR TESTIMONY?

23 A. *We initially filed the Application in October of last year and my pre-filed direct testimony*
24 *was filed in late November. Since the hearing was delayed due to my accident in*

1 *December, we thought it was important to provide the Commission with an update in*
2 *regard to the company's financial viability. We have prepared updated financial*
3 *statements and an irrevocable financial guarantee from the owner which are attached to*
4 *my testimony as **Confidential Exhibit 3.***

5 Q. IS ROMAN AFFILIATED WITH ANY OTHER COMPANY?

6 A. Roman is a privately-held company, not affiliated with any other company. Roman does
7 not maintain subsidiaries, nor is it a subsidiary of a parent company.

8 Q. HAS ROMAN REGISTERED TO DO BUSINESS IN THE STATE OF SOUTH
9 CAROLINA?

10 A. Roman was issued a Certificate of Authority to transact business in the State of South
11 Carolina on March 30, 2011. A copy of Roman's Certificate of Authorization to transact
12 business in the State of South Carolina has been included in Roman's Application for
13 Certificate of Public Convenience and Necessity under Exhibit B.

14 Q. WHAT IS THE NATURE OF ROMAN'S OPERATIONS?

15 A. Roman was organized under the laws of the State of Texas on January 26, 2011. The
16 Company proposes to offer competitive non-facilities-based interexchange
17 telecommunications services, including intrastate, inter and intraLATA toll services. The
18 Company's South Carolina intrastate operating expenses will be incremental in nature.
19 Applicant does not plan to construct facilities nor will it incur additional debt to operate
20 in South Carolina. The Company is profitable, has no accumulated debt, and is internally
21 and fully funded.

22 Q. PLEASE DESCRIBE THE SERVICES ROMAN PROPOSES TO OFFER?

23 A. Roman proposes to offer a simplified competitive intrastate, interLATA and intraLATA
24 toll service, at rates and terms which are competitive with other local exchange carriers.

1 Specifically, Roman proposes to provide non-facilities-based switched access outbound
2 “1 Plus,” interexchange telecommunications services under a single, flat monthly rate
3 unlimited calling plan, for the direct transmission and reception of voice and data
4 between locations throughout the State of South Carolina. Roman does not propose to
5 offer alternative operator services to the transient public. Roman’s goal is to provide
6 customers with interexchange telecommunications services at desirable rates, to meet
7 customers’ calling needs. When approved, Roman will provide telephone exchange
8 services to residential and commercial customers in South Carolina. The specific
9 competitive interexchange service Roman proposes to offer is more fully described in its
10 proposed interexchange tariff, which appears at Exhibit E of the Company’s Application
11 for Certificate of Public Convenience and Necessity.

12 Q. WILL THE COMPANY TARGET A PARTICULAR MARKET?

13 A. No. Roman proposes to offer intrastate interexchange services to residential and
14 commercial customers throughout the state of South Carolina. The Company intends to
15 initially target its marketing efforts to commercial customers only.

16 Q. FROM WHOM DOES ROMAN OBTAIN ITS INTRASTATE LONG DISTANCE
17 SERVICES?

18 A. Roman will obtain combined or “finished” switching, transport and access services from
19 certificated interexchange carriers to provide interexchange services, based on
20 competitive service pricing considerations. Roman will use Frontier Communications as
21 its underlying carrier.

22 Q. DOES ROMAN OWN ANY SWITCHING OR TRANSPORT FACILITIES IN SOUTH
23 CAROLINA?

24 A. No. Roman owns no switching equipment or transport facilities in South Carolina, nor

1 does it plan to purchase switching equipment of transport facilities in South Carolina.
2 Roman will be relying on the technical network capabilities of its underlying carrier(s)
3 for all network and transport facilities in the provision of access and egress for its local
4 and interexchange services.

5 Q. PLEASE DESCRIBE THE COMPANY'S TROUBLE REPORTING PROCEDURES.

6 A. All service-related problems, including trouble reporting, may be directed to Roman's
7 customer service department via either of the Company's toll-free number, 888.227.2759,
8 in writing to the Company's headquarters address or via e-mail addressed to customer
9 service at romanldinc@yahoo.com. Immediately upon report of local service trouble,
10 Roman will contact the designated service representative of the underlying carrier
11 providing the network service at issue to report the trouble and ascertain the estimated
12 time of repair. The underlying carrier will take corrective procedures and will report the
13 resolution of the trouble to Roman. The Company will then contact the customer to
14 verify that the service has been restored. Customer service representatives are available
15 from 8:00 a.m. to 7:00 p.m. Central Time to respond to billing, service, and repair
16 complaints. Messages may be left for Customer services from 7:01 p.m. to 7:59 a.m.
17 Central Time, which will be responded to on the next business day.

18 Q. HOW WILL THE COMPANY BILL ITS CUSTOMERS?

19 A. Roman utilizes incumbent local exchange carrier billing through its billing service
20 provider, B.S.G. Clearing Solutions, Inc. Roman's name and toll free telephone number
21 appear on the monthly bill.

22 Q. HOW FREQUENTLY WILL BILLS BE RENDERED TO CUSTOMERS?

23 A. Bills will be rendered on a monthly basis.

24 Q. HOW ARE BILLING DISPUTES RESOLVED?

1 A. Roman's customer service department is available to resolve any disputes. Customers
2 may reach the Company's customer service staff via its toll-free telephone number,
3 888.227.2759, in writing to the Company's headquarters address or via e-mail addressed
4 to romanldinc@yahoo.com. Customers may escalate the dispute to the responsible
5 Company manager, if necessary, and may, of course, seek intervention by the Office of
6 Regulatory Staff if necessary. Roman's employees embrace a strong customer service
7 orientation that makes meeting customer needs an absolute priority.

8 Q. HOW ARE RATE AND SERVICE INFORMATION REQUESTS PROCESSED?

9 A. Roman's customer service representatives are prepared to respond to rate and service
10 information requests through whatever medium customers elect to communicate with the
11 Company.

12 Q. HOW ARE OPERATOR-ASSISTED AND DIRECTORY ASSISTANCE CALLS
13 PROCESSED?

14 A. Roman provides directory assistance through its underlying carrier as an ancillary service
15 exclusively to its customers of record. Directory Assistance is accessible by dialing "1",
16 the area code of the desired number and "555-1212." Roman does not provide alternative
17 operator services to the transient public.

18 Q. PLEASE DESCRIBE ROMAN'S PROPOSED SOUTH CAROLINA TARIFF.

19 A. Roman's interexchange tariff establishes the rates, terms and conditions of the
20 Company's service offerings, including specific service requirements established by the
21 Public Service Commission of South Carolina. The Company believes that its services
22 are competitive with similarly-situated service providers.

23 Q. DESCRIBE ROMAN'S ORGANIZATION?

1 A. I oversee the company's day-to-day operations. I am assisted by a professional,
2 technical, and operations staffs, and a sales staff, which is outsourced under established
3 contractual agreements. The professional staff is eminently qualified to support the
4 Company's telecommunications service offerings in each of their respective disciplines,
5 through years of experience with the Company.

6 Q. HOW DOES ROMAN MARKET AND SELL ITS SERVICES?

7 A. Roman plans to market its services through outsourced telemarketing. The Company's
8 telemarketing firm specializes in telecommunications sales, complies with Federal Trade
9 Commission and Federal Communications Commission regulations and restrictions
10 governing telemarketing, including use of current do-not-call registries. All
11 telemarketing sales are independently verified, as set forth in Section 64.1120(b)(3) of the
12 Federal Communications Commission's rules, 47 C.F.R. § 64.1120(b)(3). Applicant will
13 not engage in multi-level marketing. Roman oversees all telemarketing operations and
14 assumes full responsibility for the actions of its telemarketing company. Attached as
15 **Exhibit 1** is a copy of a sample telemarketing sales script for commercial customers. The
16 Company initially plans to sell its services using telemarketing to commercial customers
17 only.

18 Q. DESCRIBE ROMAN'S INDUSTRY EXPERIENCE.

19 A. Although Roman was organized in late 2011, I possess decades long telecommunications
20 and management experience, coupled with that of my professional partners, will enable
21 the Company to operate effectively and responsibly, on its subscribers' behalf. Roman's
22 professional team maintains the necessary experience to effectively manage the
23 Company's operations.

1 Q. HAVE THERE BEEN ANY CHANGES TO THE COMPANY'S MANAGEMENT
2 TEAM SINCE THE APPLICATION WAS FILED?

3 A. Yes, Christina Gonzales is no longer employed with Roman LD.

4 Q. DESCRIBE ROMAN'S FINANCIAL ABILITY TO SERVE AS A RESALE
5 PROVIDER OF TELECOMMUNICATIONS SERVICES IN SOUTH CAROLINA?

6 A. *Roman's financial statements submitted to the Commission with its application as Exhibit*
7 *D reflected the company's assets and expenses through April 26, 2011. The Company is*
8 *currently in start-up mode and has not yet begun operations in any state. As a result, its*
9 *income statement reflects only expenses at this time. Roman is planning a national roll-*
10 *out of its services which requires the expenditure of resources for certification and other*
11 *start-up expenses. Attached as **Confidential Exhibit 3** is Roman's Balance Sheet and*
12 *Income Statement reflecting additional investments from the owner of the Company,*
13 *Sapina Quayum. The Company is fully funded and requires no external funding. A*
14 *comparison of the two financial statements reflects the input of capital from April of 2011*
15 *through the present as needed by Ms. Quayum who is funding the company. Ms. Quayum*
16 *has also provided an irrevocable financial guarantee and copies of her bank statements*
17 *from Citigold, U.S. Bank and Bank of America to demonstrate her financial situation.*
18 *These confidential documents are also is attached to the updated financial statements in*
19 ***Confidential Exhibit 3.***

20 As a reseller of telecommunications services, Roman's liabilities to its underlying
21 carriers are incurred upon the rendering of service. Roman does not plan to construct
22 facilities, hire additional employees or open offices in South Carolina or elsewhere. The
23 Company will, therefore, require no additional capitalization nor resource expenditure to
24 expand its operations in South Carolina.

1 Q. WHERE IS ROMAN CURRENTLY AUTHORIZED TO PROVIDE SERVICE?

2 A. Roman has been granted, authority to provide resold interexchange service in the states of
3 Colorado, Florida, Georgia, Kansas, Kentucky, Massachusetts, Minnesota, Nevada, New
4 Hampshire, North Carolina, Pennsylvania, Texas, Washington and Utah. Roman LD has
5 applications pending in the states of Louisiana, New York, Oklahoma, Arizona,
6 Arkansas, Maryland, New Jersey, Ohio, West Virginia and Wisconsin. In no instance has
7 Applicant's application or authority been rejected.

8 Q. HAS ROMAN BEEN THE SUBJECT OF UNAUTHORIZED ACCOUNT TRANSFER
9 ("SLAMMING") COMPLAINTS?

10 A. No. Roman has not commenced the provision of long distance services in any
11 jurisdiction. As indicated above, the Company and its telemarketing firm understand the
12 Federal Trade Commission and Federal Communications Commission regulations and
13 restrictions governing telemarketing, including use of current do-not-call registries.

14 Q. PLEASE DESCRIBE THE COMPANY'S PROCEDURES TO PREVENT
15 SLAMMING.

16 A. Roman will oversee the telemarketing operations and use the services of a reputable third
17 party verification firm to assure that all customers requesting to switch their long distance
18 service to Roman do in fact wish to have Roman as their long distance provider. Roman
19 plans to use a telemarketing firm, Unitec Info Solutions Pvt. Ltd. Unitec complies with
20 the Federal Trade Commission and Federal Communications Commission's regulations
21 and restrictions governing telemarketing. The customer's express consent is obtained
22 prior to submitting any order to change long distance service. Attached as **Exhibit 2** is a

1 copy of a sample verification script. All telemarketing sales will be independently
2 verified pursuant to 47 C.F.R. § 64.1120(b)(3).

3 Q. PLEASE GIVE US MORE DETAILS ON THE PROCEDURES THE COMPANY
4 WILL USE.

5 A. Roman LD, Inc. also adopted three key procedures to guard against the unauthorized
6 transfer of accounts: (1) all third party verifications are reviewed by Roman LD, Inc.'s.
7 quality control department to insure and confirm the validity and accuracy of the
8 independent third party verifications; (2) provide marketing agents with a script to ensure
9 that marketing agents do not deviate from established company procedures; and (3)
10 perform spot checks of marketing agent activities to include on-site visits and perform
11 separate company contact with new subscribers to confirm the validity and accuracy of
12 the independent third party verifications. Roman believes that these steps will ensure
13 Roman provides its services exclusively to those subscribers who affirmatively wish to
14 have Roman serve as their presubscribed carrier.

15 Q. HOW WILL GRANTING ROMAN'S CERTIFICATE AFFECT THE AVAILABILITY
16 OF AFFORDABLE LOCAL AND INTEREXCHANGE SERVICE?

17 A. By granting Roman's certificate, the Commission will be fostering greater competition in
18 the interexchange telecommunications services market. With additional competition,
19 existing providers will strive to offer services at the lowest rates and most innovative
20 features possible to attract new customers and retain existing customer bases.

21 Q. HOW WILL SOUTH CAROLINA CONSUMERS BENEFIT FROM ROMAN'S
22 SERVICES?

1 A. Roman's proposed services will provide consumers with another option for competitive
2 interexchange services. Competition in the telecommunications marketplace inspires
3 innovation and development of services that meet customer needs cost effectively.
4 Customers will benefit from Roman's innovative service offerings and billing options.
5 Additionally, an increase in the traffic generated through the provision of the Company's
6 proposed intrastate services over existing facilities will help improve the efficiency of
7 those facilities and reduce the underlying carriers' costs in provisioning such services.
8 And the State of South Carolina will realize an increase in tax revenue. I believe that
9 Roman will operate as the very type of responsible, solid interexchange carrier that the
10 Commission wishes to enter the State of South Carolina.

11 Q. WHY IS THE COMPANY SEEKING EXEMPTIONS FROM REQUIREMENTS TO
12 MAINTAIN RECORDS IN SOUTH CAROLINA AND FROM USOA ACCOUNTING
13 REQUIREMENTS?

14 A. Roman's requests a waiver of the requirements of 26 S.C. Reg. 103-610 that require a
15 carrier to keep all records required by the Commission's rules and regulations with the
16 State of South Carolina. Since the company's corporate records are maintained in Texas,
17 and Roman does not anticipate maintaining offices or personnel in South Carolina, it
18 would create an additional expense and be unduly burdensome to maintain records in
19 South Carolina. Roman maintains a registered agent in South Carolina and will bear any
20 costs associated with the Commission's inspection of our records and books at our
21 headquarters. Further, records will be made available to the Commission and the Office
22 of Regulatory Staff upon request, at no charge. The Commission and the Office of
23 Regulatory Staff will not be inconvenienced, and the public will not be exposed to any
24 risk through the grant of this waiver request. I understand that similar requests for waiver

1 of R.103-610 are routinely granted by the Commission.

2 Roman has also respectfully requested exemption from Commission requirements that
3 might require Roman to maintain its financial records in conformance with USOA. As a
4 competitive carrier, Roman maintains its books in accordance with Generally Accepted
5 Accounting Practices ("GAAP"), and therefore, do not possess, nor is it required to
6 maintain the detailed cost data required by USOA. Otherwise, maintaining books under
7 GAAP and USOA would create a hardship to maintain a separate accounting system.

8 Q. HAS ROMAN REQUESTED MODIFIED ALTERNATIVE REGULATION OF ITS
9 LONG DISTANCE BUSINESS SERVICES, AND OPERATOR SERVICE
10 OFFERINGS?

11 A. Yes. Since Roman will operate as a non-dominant, competitive provider of interexchange
12 services, the Company has requested that its long distance business and any future
13 operator service offerings to subscribers of record be regulated pursuant to the procedures
14 described in Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C, as modified by
15 Order No. 2001-997 in Docket No. 2000-407-C. Because of both the level of
16 competition found by the Commission in Docket No. 95-661-C and the Commission's
17 decision to permit AT&T greater rate flexibility, Roman submits that it is critical to the
18 continued development of a competitive market for telecommunications services that the
19 Commission apply the alternative regulation described in Order Nos. 95-1734 and 96-55
20 to Applicant's service offerings. Further, Roman has requested that the Commission: a)
21 remove the maximum rate tariff requirements for these service offerings; b) presume that
22 Roman's tariff filings for these services will be valid upon filing unless an investigation
23 of a particular filing is instituted within seven (7) days, in which case the tariff filing will
24 be suspended until further order of the Commission; and c) grant Roman the same

1 treatment as similarly situated carriers in connection with any future relaxation of the
2 Commission's reporting requirements.

3 Q. WILL THE COMPANY SUPPORT UNIVERSAL SERVICE AS REQUIRED?

4 A. Yes, the Company avers to support South Carolina's Universal Service Fund as required.

5 Q. DOES THAT CONCLUDE YOUR TESTIMONY?

6 A. Yes, it does.

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Docket No. 2011 – 432 - C

ZEPEDA TESTIMONY

EXHIBIT 1

SAMPLE TELEMARKETING SCRIPT

Unlimited Calling Plan
Sales Script

Hello, This is -----, with Roman LD, Inc., a long distance service provider. May I please speak with the person in charge of the telephone account? What is your title with the company? (must be a person w/a title of authority)

Roman LD is currently offering several plans for long distance calls and services. This call is regarding the featured savings and value of our unlimited calling plan. We have a very competitive rate of \$24.99 per line which includes unlimited calling, anywhere in the USA, Canada and European Land Lines. For accounts with multiple lines there is also business multi-line charge of \$6.50 for each additional line. There's no monthly minimum usage or contract required. You can cancel at anytime by calling **888-227-2759**. For additional information you can visit our Web Site at www.romanldinc.com.

Would you like to try Roman LD's unlimited calling plan for a monthly recurring fee of \$24.99? .

(If customer agrees to take the service, proceed for data gathering.)

Let's get you started!

May I please have your name and title? (must be a title of authority)

Business Name and Address

Billing Phone Number (BTN)

All other phone numbers listed (WTN)

Are you 18 years or older and duly authorized by the telephone account owner to make changes to and incur charges on this telephone account provided? (Must receive a YES)

Single Line accounts please read:

Do you agree to Roman LD's unlimited calling plan for a monthly recurring fee of \$24.99 per line? (Must receive a YES)

Multiple line account please read:

Do you agree to Roman LD's unlimited calling plan for a monthly recurring fee of \$24.99 per line and a business multiline charge of \$6.50 per line? (Must receive a YES)

Now, I will transfer you to a verification agent. In the verification process they will ask you a few simple questions. When prompted please state a firm YES or NO.

Thank you and, before I transfer you, I just have to read you a short disclosure:

Although, there is a billing agreement with the local phone company, in order to have this charge placed on the local telephone bill, I do need to verify that you understand that Roman LD, Inc. and your local telephone company are not affiliated in any way, and are separate and independent companies. All calls and charges will be posted on your local telephone bill in the section "Billing on behalf of Roman LD, Inc." which will appear on the USBI billing page. To switch the long distance service there may be a one-time switching fee of \$5.00 per line, imposed by the local telephone company. You can cancel

at anytime by calling 888-227-2759 or you can write to us at 2300 Valley View Lane, Suite. 340; Irving, Texas 75062.

Now, to confirm a carrier request change and your activation, I need to transfer you to a third-party verification company. Please be advised that the verification center cannot answer any questions in regard to your order. Thank you for choosing Roman LD, and please hold while I transfer your call.

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ZEPEDA TESTIMONY

EXHIBIT 2

SAMPLE VERIFICATION SCRIPT



Unlimited Calling Plan

Verification Script

Hello, Mr. or Mrs. (Contact Name) this is with (Verifier's name) with (name of verification company). This conversation will be recorded to **confirm a carrier request change of your long distance service to *Roman LD, Inc.***

Mr. or Mrs. _____ are you at least eighteen (18) years of age and authorized by the telephone account owner to make changes to and incur charges on this telephone account? **Yes/No.**

Please provide your official title _____

You do authorize this carrier SWITCH for telephone numbers _____, _____, _____, _____, _____ to Roman LD, Inc. (yes/no). ?

Billing name as it appears on the local telephone bill is _____.

Billing address as it appears on the local telephone bill is _____.

Name of the local telephone company is _____.

Mr. or Mrs. _____ is all this information correct? **YES/NO.** To confirm our conversation on (today's date). _____ please state your first and last name _____, your date of birth or your mother's maiden name _____.

Do you agree to Roman LD's unlimited calling plan for a monthly recurring fee of \$24.99 per line? (Must receive a YES)

You do authorize *Roman LD, Inc.* to be your intraLATA/intrastate toll long distance service provider for all the company lines? **Yes/No.**

You do authorize *Roman LD, Inc.* to be your interLATA/interstate toll long distance service provider for all the company lines? **Yes/No.**

You do authorize *Roman LD, Inc.* to be your international toll long distance service provider for all the company lines? **Yes/No.**
You do understand *Roman LD, Inc.* is a separate company and not affiliated w/your local telephone company and that the long distance billing will appear on your local telephone bill on the USBI bill page as being billed on behalf of *Roman LD, Inc.* ? **Yes/No.**

Single Line Accounts please read:

Mr. or Mrs. _____ you do understand that *Roman LD, Inc.* will be providing you with unlimited calls anywhere in the United States, Canada and Europe land lines for one low monthly fee of \$24.99 for each line? **Yes/No**

Multiple Line Accounts please read

Mr. or Mrs. _____ you do understand that *Roman LD, Inc.* will be providing you with unlimited calls anywhere in the United States, Canada and Europe land lines for one low monthly fee of \$24.99 for each line and a business multiline charge of 6.50 per line? YES/NO

Please remember there may be a one-time switching fee of \$5.00 per line imposed by the local telephone company to change the long distance service.

For questions or to cancel your service please, call customer service at 1(888) 227-2759 or you can write to 2300 Valley View Lane, Suite. 340; Irving, Texas 75062.

This completes the verification process of your selected carrier switch to *Roman LD, Inc.* as your selected long distance service provider.

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ZEPEDA SUPPLEMENTAL TESTIMONY

EXHIBIT 3

FINANCIAL INFORMATION

CONFIDENTIAL & PROPRIETARY

FILED UNDER SEAL

State of California)
)
County of Los Angeles)

IRREVOCABLE FINANCIAL GUARANTEE

I, Sapina Quayum, am owner of Roman LD, Inc., an Applicant for Certificate of Public Convenience and Necessity to Provide Non Facilities-Based Interexchange Services in the State of South Carolina, and am authorized to make this Irrevocable Financial Guarantee in support of its pending Application.

I hereby submit this Irrevocable Financial Guarantee to Roman LD, Inc. for an amount necessary to meet its documented expenses for an amount not to exceed \$100,000. This Guarantee is available to the Company effective immediately and expiring one year from the date of Roman LD, Inc.'s order granting it a certificate of public convenience and necessity. Attached and incorporated by reference are my personal financial statements which demonstrate that I possess the financial resources to make this Irrevocable Financial Guarantee.

Executed on the 22ND of February, 2012 at Los Angeles, California

By: _____

Sapina Quayum
2300 Valley View Lane Suite 340
Irving, Texas 75062

Subscribed and sworn to before me this 22ND of February, 2012

Samantha Kang
Notary Public in and for the State of California

My Commission expires: Dec 31, 2013

STATE OF CALIFORNIA COUNTY OF LOS ANGELES
Subscribed and sworn to (or affirmed) before me
on Feb 22, 2012
By SAPINA QUAYUM
proved to me on the basis of satisfactory evidence to be the
person(s) who appeared before me.
Samantha Kang
Notary Public

